

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of a Repository Docket in            )  
Which to Gather Information About the            )  
Lifeline Program and Evaluate the                )  
Purposes and Goals of the Missouri             )  
Universal Service Fund                            )            Case No. TW-2014-0012

**SPRINT’S RESPONSE TO INVITATION TO COMMENT ABOUT THE POSSIBLE  
CREATION OF A MISSOURI UNIVERSAL SERVICE HIGH-COST FUND**

Sprint Communications Company L.P., Sprint Spectrum L.P. and Virgin Mobile USA, L.P. d/b/a Assurance Wireless Brought To You By Virgin Mobile (collectively “Sprint”) hereby provides comments in response to the Invitation To Comment About The Possible Creation Of A Missouri Universal Service High-Cost Fund, issued by the Commission on January 15, 2014. Sprint responds as follows:

**I. INTRODUCTION**

Sprint appreciates the opportunity to comment on the possible creation of a state universal service high-cost fund in Missouri. Several of the questions posed in this invitation were addressed in Sprint’s previous comments in this proceeding, and we incorporate those comments here by reference.<sup>1</sup> In these comments, we focus on questions not covered in our previous comments and update our previous answers as appropriate.

**II. SPECIFIC QUESTIONS**

**1. Does Missouri need a state high-cost fund?**

Sprint continues to believe that there is no need for the Missouri Public Service Commission (the “Commission”) to create a state high-cost fund. The current data on

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<sup>1</sup> See, Sprint Comments In Response to the Notice of Opportunity to Comment (filed August 29, 2013), *In the Matter of a Repository Docket in Which to Gather Information About the Lifeline Program and Evaluate the Purposes and goals of the Missouri Universal Service Fund*, File No. TW-2014-0012.

subscriberhip still indicates that no additional subsidies are necessary to ensure that the citizens of Missouri continue to have access to voice service. The existing Federal universal service fund (FUSF) provides support to both high-cost areas and low income customers, and the existing Missouri USF provides additional support for low income customers. There is no evidence that the current levels of support are insufficient to keep customers in Missouri from dropping off the network. Indeed, Missouri has a higher penetration rate<sup>2</sup> than the national average at all but one level of income, as shown in Table 1 below.

<b>Table 1</b>						
<b>Household Penetration by State and Income, 2013</b>						
Income	<\$10K	\$10K to <\$20K	\$20K to <\$30K	\$30K to <\$40K	\$40K+	All
Missouri	95.5	94.6	97.8	98.9	99.3	97.0
United States	92.6	95.6	97.0	97.2	98.3	96.0
Source:	2013 Universal Service Monitoring Report, Table 3.8, available online at <a href="http://transition.fcc.gov/Bureaus/Common_Carrier/Reports/FCC-State_Link/Monitor/2013_Monitoring_Report.pdf">http://transition.fcc.gov/Bureaus/Common_Carrier/Reports/FCC-State_Link/Monitor/2013_Monitoring_Report.pdf</a>					

Given that more of Missouri’s citizens are on the network compared to the national average, it is clear that no expansion of USF subsidies is needed.

**2. What issues need to be addressed by the Public Service Commission in order to establish a high-cost fund?**

If the Commission decides to establish a high-cost fund, there are five basic steps required. First, the Commission must determine what service(s) – voice only, broadband, etc. - it wishes to support and then determine the cost of providing that service to each location, using the lowest cost technology for each location. Second, the Commission would have to determine an affordable rate. This should be set based on some assessment of what price is needed to keep customers on the network, not merely set at the current level of prices, which may be set

<sup>2</sup> The penetration rate is the percentage of households in the state that have access to telephone service.

unreasonably low. In addition, this affordable rate level would need to take into consideration the federal and Missouri Lifeline programs which already make service to low-income individuals affordable. This means that the affordable rate level for any high-cost fund can be set higher than if low-income support was not available. The state USF would also need to be reduced by the amount of any federal USF that the companies are already receiving.<sup>3</sup> Third, the amount of high-cost subsidy should be set at the difference between the cost of the lowest cost technology for each location and the affordable rate for consumers who are not low-income individuals and this amount made available to any carrier willing to serve that location. Fourth, the Commission will need to determine if there are unsubsidized competitors providing service in the area where an incumbent is seeking subsidy. If there is an unsubsidized competitor, then state USF funds should not be available in that area. This mirrors what the FCC is implementing in its *USF/ICC Transformation Order*.<sup>4</sup> Finally, the Commission will need to determine who will pay the subsidy.

The Federal Communications Commission (FCC) has in the past set its high-cost support levels based on a cost model, but that cost model considered only circuit switched wireline technology, and even with that limitation it still took several years to develop the cost model and decide the hundreds of inputs that were used in the cost model.<sup>5</sup> Given the technologies currently available to provide service, both wireless and wireline, any cost model developed today will be even more complex.

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<sup>3</sup> In 2012, the latest full year for which data are publicly available, the federal high-cost fund paid \$106M to Missouri carriers, and \$55M in low income support.

<sup>4</sup> In the Matter of : Connect America Fund et al. WC Docket 10-90 et al. Report and Order and Further Notice of Rulemaking, 26 FCC Rcd 17663 (2011), ¶ 103 (“all broadband build out obligations for fixed broadband are conditioned on not spending the funds to serve customers in areas already served by an ‘unsubsidized competitor’”); ¶ 170 (for Price Cap carriers “we will also exclude areas where ... an unsubsidized competitor offers affordable broadband”); ¶ 206, f.n. 325 (for rate of return carriers “we intend to target support to areas where there is no unsubsidized competitor”)

<sup>5</sup> The FCC is currently developing a cost support model that reflects today’s choices of wireline technology, but it still does not reflect wireless technology.

If the Missouri Commission were to expand the current USF to include a high-cost component that correctly reflected today's technology choices, it would have to consider at a minimum wireline circuit switched service, Internet protocol ("IP") network elements and technologies (including cable telephony), and wireless service. Needless to say, determining the cost model, including the inputs needed for the cost model, would be a very resource intensive process. Since there is no indication that there is any need to expand support, there is no need for the Commission and industry to dedicate resources to such an undertaking.

**3. What services should be supported?**

Sprint does not think any services need support from a state universal service fund at this time.

**4. What types of providers should be able to receive high-cost support?**

If the Commission establishes a fund, the support should be available to any carrier willing to serve a high-cost area, regardless of the technology used. However, support should not be available in any area where there is an unsubsidized provider available (regardless of technology), as the presence of that provider is proof that support is not needed.

**6. What state(s), if any, have a state high-cost fund that Missouri should strive to mirror?**

Again, it is readily apparent that there is no need for a state high-cost fund. Moreover, the certainty of creating a new market distortion with the attendant harm to competition makes creating such a fund inadvisable. If, in spite of these significant concerns, the Commission determines to consider a state high-cost fund, it should consider the approach taken in the state of Washington, which recently revised its state USF. Several of the features adopted in that revision should be considered in Missouri as well. This plan has several appropriate features.

First, the fund size is limited.<sup>6</sup> Keeping the fund small will minimize the burden on those companies and customers who pay into the fund, and also minimize the distortion of the marketplace that will result from subsidized prices. Once subsidized prices are put in place, the ability of other providers to enter an area will be reduced, since they will have to be able to beat the subsidized price, or be able to have access to the subsidy as well.

Second, the plan has a specified end date.<sup>7</sup> This is an important feature because it will ensure that the plan is reviewed and adjusted as necessary. If the plan is merely adopted with no end date, the inertia will be in favor of continuing the plan, whether it continues to meet a need or not. Instead, any plan should be reviewed and revised periodically to ensure that the plan remains needed and is still effective.

Third, the plan is specifically targeted to the smallest carriers.<sup>8</sup> Larger carriers and those that have had exchanges declared competitive typically have multiple sources of revenue and a large number of customers over whom to recover their fixed costs, both of which reduce their need for any subsidy. In Missouri, price cap carriers subject to regulation under RSMo. 392.245.1 and 2 have considerable pricing flexibility and should not be eligible for funding. Moreover, carriers that have had exchanges declared competitive or have been deemed competitive pursuant to RSMo. 392.245.5 have unlimited pricing flexibility and should not be eligible for state USF funds. By focusing support on only the smallest carriers that are rate of return regulated, the fund can be targeted more narrowly where it is truly needed.

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<sup>6</sup> Washington's fund is set at \$5M per year. Similarly, the New York State USF is limited to a fund size of \$5M annually. See, Phase 2 Order, *Proceeding to Examine Issues Related to a Universal Service Fund*, New York Pub. Svc. Comm., Case No. 09-M-0527 (August 27, 2012). The appropriate size of any fund for Missouri may well differ.

<sup>7</sup> The Washington fund expires in 2018. The New York Fund ends 4 years after its implementation.

<sup>8</sup> In Washington, this is companies of less than 40K lines. In New York only small rate of return ILECs are eligible to receive funds. Verizon and Frontier are price cap regulated in New York and are excluded from being a fund recipient.

Finally, the plan is funded out of general tax revenues rather than assessments on other carriers. This avoids the market distortions that come from funding one carrier through payments made by other carriers.

**7. Should an attempt be made to limit the size of the fund?**

Yes. See the answer to question number 5 above. Any fund that is implemented should be on a strict budget so as to not encourage unchecked growth in the size of the fund once it is implemented.

**9. Is there a need to revise how the Missouri USF is funded to accommodate a high-cost fund?**

As discussed in the response to question number 5 above, any high-cost fund would be best funded from general tax revenue rather than an assessment on other carriers. If funding continues to come from assessments on carriers, then the services and carriers that are assessed for the high-cost fund should match up with the services and carriers that are funded. That is, if only voice service by wireline companies is subsidized, then only wireline companies that provide voice services should pay into the fund. Similarly, if wireless carriers are not eligible to receive money from the fund, then they should not have to pay into it either. Under current Missouri law wireless services are not considered telecommunications services and thus may not be assessed to support a Missouri state USF.<sup>9</sup>

**III. CONCLUSION**

As discussed *supra* and in our previous comments, Sprint does not believe that the Commission should expand the existing Missouri USF to include a high-cost fund. There is no

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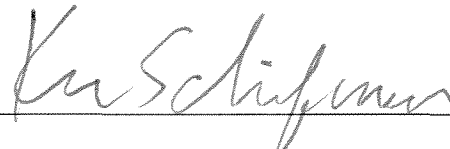
<sup>9</sup> RSMo 386.020 (54)(c) exempts wireless services from the definition of “telecommunications services”. RSMo 392.248.3 allows assessments only to telecommunications companies providing Missouri jurisdictional telecommunications services. Reading these two statutes together, the conclusion is that current statutes prohibit assessments on wireless carriers.

reason to believe that the existing support for voice services needs to be increased, nor that an expansion of coverage to include wireless or broadband services is necessary. If the Commission nonetheless ventures to expand the Missouri USF, then it must expend significant resources to properly design and implement a high-cost fund; ensuring that the fund is as small as possible, time limited, does not provide subsidy to incumbent LECs that have voluntarily opted into regulatory classifications that permit considerable or unlimited pricing flexibility, does not provide funds in an area where an unsubsidized carrier is offering service, and does not assess carriers that are not fund recipients.

Respectfully submitted this 14th day of February, 2014.

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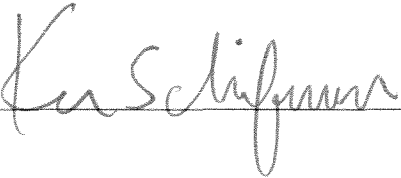
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this <sup>14</sup> day of February, 2014, a copy of the above and foregoing was served via US mail, facsimile or electronically mailed to the following:

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